

IndiaFirst Life Insurance Company Limited

Policy on Preservation of Documents

Document Control and Classification

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Secretarial Team	Chief Finance Officer	Board of Director 18-10-2022

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1. Preamble:

- Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations") requires IndiaFirst Life Insurance Company Limited(the "**Company**") to frame a Policy for Preservation of Documents ("**Policy**"), approved by the board of directors of the Company (the "**Board of Directors**"), classifying them in at least two categories:
 - i. Documents whose preservation shall be permanent in nature; and
 - ii. Documents to be preserved for not less than eight years.
- Documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognises that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. Preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.
- Accordingly, the Board of Directors has approved the policy for preservation of document (the "**Policy**") on (date).

2. Applicability and Modes of Preservation:

- This Policy is applicable for all documents maintained in physical as well as electronic mode by the Company. Preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.
- Documents not specifically covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

3. Definitions:

- "**Act**" means the Companies Act, 2013.
- "**Applicable Law**" means any existing or new enactments, circulars, laws, rules, regulations issued by Insurance Regulatory and Development Authority of India ("**IRDAI**") , Securities and Exchange Board of India ("**SEBI**"), Ministry of Corporate Affairs ("**MCA**"), Institute of Company Secretaries of India ("**ICSI**") or by the Government of India/ State Governments or laws enacted by any overseas country which has an impact on the Company's businesses as also rules, regulations or standards which are issued by any statutory bodies in India governing the Company and other professional bodies under which the preservation of documents has been prescribed.
- "**Authorised Person**" means the functional head of the concerned department or managing director of the Company.

- **“Documents”** refers to documents, writings, papers, notes, agreements, deeds, contracts, summons, notices, agenda, circulars, advertisements, requisitions, order, declarations, forms, minutes, indices, registers, correspondence, challan or any other record required under or in order to comply with the requirements of any applicable law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained in physical or in electronic form.
- **“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub- section (1) of section 2 of the Information Technology Act, 2000.
- **“Electronic Form”** means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access thereto.
- **“Maintenance”** means keeping documents, either in physical or in electronic form.
- **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

Words and phrases used in this Policy and not defined herein shall derive their meaning as included under Applicable Law.

4. Coverage:

- This Policy is intended to guide the Company and its employees in maintenance of documents, their preservation and disposal.

5. Authenticity:

- Where a document is being maintained both in physical form and electronic form, the authenticity with reference to the physical form should be considered for every purpose.

6. Modes of Preservation:

- Documents may be preserved in:
 - i. Physical form; and / or
 - ii. Electronic form
- The preserved documents must be accessible at all reasonable times. Access may be controlled by the Head of the Department, so as to ensure integrity of the documents and to prohibit unauthorized access.
- As a general principle, a Document should be permanently preserved, even beyond the requirements of Applicable Law, where the Document has a particular legal, historical or business significance and is of such nature that it should be available to the Company for the long term.

- Each employee shall abide by the Policy. Each Authorised Person shall guide the employees in his department and ensure that they identify and classify Documents and take appropriate action with regard to their Preservation in accordance with this Policy.
- Notwithstanding anything contained above, where any Documents are required to be maintained at the registered office of the Company, then they shall be maintained at such place.

7. Responsibility of Preservation:

- Head of the Department (“HOD”) of the respective department shall be responsible for preservation of documents pertaining to the department.
- Where the HOD tenders resignation or is transferred from one location to another, such person shall hand over all the relevant documents, lock and key, access control or password, or compact disc, other storage devices or such other documents and devices in his possession, if any to the incoming incumbent. Information of the cessation or transfer of the Authorised Person shall also be intimated to the Company Secretary (CS) and information technology department (“IT Department”) of the Company.
- The Authorised Person will co-ordinate with the IT Department of the Company to ensure Preservation of Documents in electronic form, as appropriate.
- In case the HOD ceases and no one has been appointed in his place, the senior-most ranking person in the said department shall be responsible for preservation of documents.
- As a general rule, a particular Document shall be considered to belong to a particular department if it originated in such department or if it comes under the scope of responsibility of the HOD of such department. In case a Document is part of two or more departments or if there is ambiguity as to the department to which a particular Document belongs, the matter may be mutually agreed between both the HODs.
- Each Authorised Person shall be required to preserve the Document pertaining to his or her department.
- Documents which are to be preserved are given in Annexure – A.

8. Destruction of Documents:

- After the expiry of the statutory retention period, the preserved documents may be destroyed, with the prior approval of the Authorised Person.
- Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/ unimportant/ irrelevant/ short-term use only. This applies to both physical and electronic Documents.
- Documents may be destroyed as follows:
 - i. Recycle non-confidential paper records;

- ii. Shred or otherwise render unreadable confidential paper records;
 - iii. Delete or destroy electronically stored data.
- A register of documents disposed/ destroyed may be maintained which shall state the brief particulars of the documents destroyed, date of disposal/ destruction and the mode of destruction. Entries in the register shall be authenticated by the person responsible for preservation as per Para 7 aforesaid.
 - The Authorised Person shall exercise due diligence while destroying any Documents, including seeking confirmation from other relevant departments or external consultants, to the extent necessary.
 - The functional head of the IT Department shall make appropriate provision for back up for Electronic Records.

9. Review of Policy:

- This Policy shall be subject to review, if necessary. Any change/ amendments in applicable laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review.
- Any change/amendments to this Policy shall be recommended by the audit committee of the Company for the approval of the Board of Directors.

Records under Companies Act, 2013
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Sr No.	Record Type	Preservation Period
1	Memorandum and Articles of Association	Permanent
2	Certificate of Incorporation	Permanent
3	Minutes of Board and Committee Meetings	Permanent
4	Minutes of Shareholders' Meetings	Permanent
5	Register and Index of Members	Permanent
	All other Statutory Registers, as applicable	Permanent
	Documents relating to the issue of share certificates, including the blank forms of share certificates	Permanent
	Annual Return	Permanent
	Various licenses and permits/approvals received by the Company wrt the business of the Company.	Permanent
6	Forms filed with Registrar of Companies (ROC)	Permanent
8	Attendance Register – Board and Committee Meetings	8 Financial Years
9	Notice, Agenda, Notes on Agenda and other related papers of the Board and Committee Meetings	(as long as they remain current or for 8 financial years), whichever is later
10	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
11	Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto	8 Financial Years from date of filing with the Registrar
12	Scrutinizer's Reports on voting at General Meetings/ Postal Ballot	(as long as they remain current or for 8 financial years), whichever is later
13	Postal Ballot forms	8 Financial Years

Records under SEBI Regulations

Sr No.	Record Type	Preservation Period
1	Disclosures under SEBI – Substantial acquisition of shares and Takeovers Regulations, as applicable	(as long as they remain current or for 8 financial years), whichever is later
2	Disclosures under SEBI – Prohibition of Insider Trading Regulations, as applicable	
3	Newspaper publications, as applicable	
4	Listing Agreements executed with the stock exchange	Permanent

Accounts and Financial Records

Sr No.	Record Type	Preservation Period
1	Annual Audited Financial Statements	Permanent
2	Books of Accounts, Ledgers & Vouchers	8 Financial Years
3	Investment Records	8 Financial Years
4	Engagement letters from Auditors	8 Financial Years
5	Audit Reports & Replies	Permanent
6	Foreign Remittance Details	Permanent

Tax Records

Tax records including but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeals preferred against any claim made by relevant tax authorities, shall be maintained for a period of 8 financial years or for a period of 8 financial years after final order has been received with respect to any matter which was preferred for Appeal, as the case may be.

Last Approval date: October 18, 2022
